

Annual 47 C. F. R. 64.2009(e) CPNI Certification

E B Docket 06-36

Annual 64.2009(e) CPNI Certification for **2018**

Date filed: **February 20, 2019**

Name of Company covered by this certification: **Troy Cablevision, Inc.**

Form 499 Filer ID: **824198**

Name of Signatory: **Vicki F. McPherson**

Title of Signatory: **Secretary/Treasurer**

I, **Vicki F. McPherson**, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C. F. R. 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's operating procedures ensure that the company **is** in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company **has not** taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI. If applicable, a summary of actions taken will be attached to this certification.

The company **has not** received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information). If applicable, a summary of customer complaints will be attached to this certification.

Signed 
Vicki F. McPherson

CERTIFICATE OF COMPLIANCE WITH PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION RULES


Vicki F. McPherson signs this Certificate of Compliance in accordance with Section 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and the FCC's Code of Federal Regulations (CFR) Title 47 64.2009, on behalf of **Troy Cablevision, Inc.** This Certificate of Compliance addressed the requirement of FCC's (CFR) Title 47 64.2009 that the Company provide both a Certificate of Compliance and a "statement accompanying the certificate" to explain how its operating procedures ensure compliance with FCC's (CFR) Title 47 64.2001-.2011.

On behalf of the Company, I hereby certify as follows:

1. I am the Secretary/Treasurer of the Company. My business address is 1006 South Brundidge Street, Post Office Box 1228, Troy, Alabama 36081-1228.
2. I have personal knowledge of the facts stated in this Certificate of Compliance. I am responsible for overseeing compliance with the Federal Communication Commission's (FCC) rules relating to customer proprietary network information (CPNI).
3. The Company has established a system by which the status of a customer's approval for use of CPNI, as defined in 47 USC 222(h)(1), can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.
4. The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. However, Company personnel make no decisions regarding CPNI without first consulting with myself or **Jimmy R. Copeland**, the Company's Director of Business Development. The Company has an express disciplinary process in place for personnel who make unauthorized use of CPNI.
5. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Company likewise maintains records of its affiliates' sales and marketing campaigns that use CPNI. The Company also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company maintains these records in its offices for a minimum of one year.
6. The Company's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. The Company maintains records of customer approval and disapproval for use of CPNI in a readily-available location that is consulted on an as-needed basis.

7. The Company's policy is to maintain records of a CPNI breach for a minimum of two years. These records will include a description of the steps the Company took to prevent the breach, how the breach occurred, the impact of the breach and proof of notification to law enforcement and the customer, if applicable.
8. The Company has a supervisory review process regarding compliance with the FCC's rules relating to protection of CPNI for outbound marketing situations. The purpose of this supervisory review process is to ensure compliance with all rules prior to using CPNI for a purpose for which customer approval is required. Company personnel, prior to making any use of CPNI, must first consult with myself or Jimmy R. Copeland regarding the lawfulness of using the CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is proper, either Jimmy R. Copeland or I consult one or more of the following: the Company's own compliance manual, the applicable FCC regulations, the FCC's Compliance Guide, and, if necessary, legal counsel. The Company's sales personnel must obtain supervisory approval from either Jimmy R. Copeland or I regarding any proposed use of CPNI.
9. Further, both Jimmy R. Copeland and I personally oversee the use of opt-in, opt-out, or any other approval requirements, or notice requirements (such as notification to the customer of the right to restrict use of, disclosure of, and access to CPNI), contained in the FCC's regulations. I also review all notices required by the FCC regulations compliance therewith.
10. Jimmy R. Copeland and I also ensure that the Company enters into confidentiality agreements, as necessary, with any joint venture partners or independent contractors to whom it discloses or provides access to CPNI.
11. Both Jimmy R. Copeland and I personally oversee completing and submitting EB Docket No. 06-36, which is due on or before March 1 each year. The form includes explanation of any action taken against data brokers, a summary of all customer complaints, and an explanation of breaches.

IN WITNESS WHEREOF, I have executed this Compliance Certificate as of February 20, 2019.



Vicki F. McPherson
Secretary/Treasurer

CUSTOMER COMPLAINTS REGARDING CPNI

DATE	DESCRIPTION OF COMPLAINT	ACTION TAKEN
NONE		



Signature

February 20, 2019

Date

ACTION(S) TAKEN AGAINST DATA BROKERS

FILING DATE	FILED WITH (State Commission, FCC, Courts)	EXPLANATION
NONE		



Signature

February 20, 2019

Date